

LOVELL STEWART HALEBIAN JACOBSON LLP

61 Broadway, Suite 501
New York, New York 10006
www.lshllp.com

Telephone
212.608.1900

Facsimile
212.719.4775

November 9, 2015

BY ECF

Hon. P. Kevin Castel
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Sullivan v. Barclays PLC et al., No. 13 Civ. 2811

Dear Judge Castel:

Pursuant to paragraph 1.C. of Your Honor's Individual Practices, Plaintiffs respectfully request a two-week extension, from November 20 until December 4, 2015, of Plaintiffs' time to submit their papers in opposition to Defendants' motions to dismiss.

Plaintiffs have not previously requested an extension of their time to oppose these motions. Defendants do not oppose this application provided that their reply brief time is similarly extended, until December 23, 2015. There is no conference currently scheduled before the Court. The requested extension will not affect any other dates set by the Court in this matter.

As reasons for this relief, Plaintiffs respectfully state as follows. Defendants took 60 days to submit their motion papers. Plaintiffs have 37 days to oppose. With this two-week extension, Plaintiffs will have 51 days to oppose the motions. Second, Plaintiffs have received substantial new information this past week (approximately 1500 files, the vast majority of which are audio) and will be receiving more materials from the Barclays Defendants. These latter documents will include data for transactions in Euribor-based derivatives with U.S.-based counterparties. These materials may be relevant to certain of Plaintiffs' responses to Defendants' jurisdiction arguments.

Third, Defendants' motions to dismiss raise multiple complex and sharply disputed issues, including some involving recent conflicting case law. Plaintiffs respectfully submit that the parties, the Court, and the administration of justice will benefit from the additional two weeks that permit Plaintiffs to address these complex issues in the most simple and concise manner.

Thank you very much.

Hon. P. Kevin Castel
November 9, 2015
Page 2

Respectfully submitted,

Christopher Lovell

/s/ Christopher Lovell
clovell@lshllp.com

Vincent Briganti

/s/ Vincent Briganti
vbriganti@lowey.com

cc: All Counsel (by ECF)